

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
(BOSTON DIVISION)

CASE NO. 17-CR-10265

UNITED STATES OF AMERICA,

Plaintiff,

v.

SALLY ANN JOHNSON,

Defendant.

**UNOPPOSED MOTION FOR TWO-DAY
ENLARGEMENT OF TIME TO FILE SENTENCING MEMORANDUM**

The Defendant, SALLY ANN JOHNSON, through undersigned counsel, and without the opposition of the Assistant United States Attorney assigned to this matter, respectfully requests that this Honorable Court grant him a two-day enlargement of time to file a sentencing memorandum. Specifically, undersigned is requesting that he be permitted to file a sentencing memorandum by Friday, January 12, 2018. In support, Ms. Johnson states as follows:

1. Ms. Johnson's sentencing is scheduled for January 17, 2018. The Court set a deadline of today, January 10, 2018, to file a sentencing memorandum in this matter.
2. An enlargement of time to file a sentencing memorandum is being requested as undersigned needs additional time to review newly obtained documents that undersigned is reviewing and that may be introduced at the sentencing hearing.

3. Additionally, undersigned was on a prepaid vacation from December 27, 2018, until January 5, 2018. As a result, his workload increased for the balance of December, which resulted in additional court hearings being scheduled and a corresponding decrease in office time to prepare the memorandum.

4 Undersigned is therefore requesting until Friday, January 12, 2018, to file a sentencing memorandum in this matter.

5. Assistant United States Attorney Brian Perez-Daple does not oppose the instant request.

WHEREFORE, the Defendant, SALLY ANN JOHNSON, through undersigned counsel, and without the opposition of the Assistant United States Attorney assigned to this matter, respectfully requests that this Honorable Court grant him a two-day enlargement of time to file a sentencing memorandum in this matter.

Respectfully submitted,

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By: /s/ Paul Petruzzi
PAUL D. PETRUZZI, ESQ.
Florida Bar No. 0982059

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 10, 2018, a true and correct copy of the foregoing was furnished by CM/ECF to all counsel of record.

By: /s/ Paul Petruzzi
PAUL D. PETRUZZI, ESQ.
Attorney for Sally Ann Johnson